

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

GENBIOPRO, INC.

PLAINTIFF

V.

CIVIL ACTION NO. 3:20-CV-00652-HTW-LGI

**DR. THOMAS DOBBS, STATE HEALTH OFFICER
OF THE MISSISSIPPI DEPARTMENT OF HEALTH,
IN HIS OFFICIAL CAPACITY**

DEFENDANTS

GENBIOPRO, INC.’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff, GenBioPro, Inc. (“GBP”), by and through counsel, hereby moves the Court for leave to file its Proposed Amended Complaint, attached hereto as Exhibit A. GBP seeks to amend its original Complaint, filed October 9, 2020 (ECF No. 1), in order to address the impact of the Mississippi “Trigger Law,” MISS. CODE ANN. § 41-41-45, which went into effect on July 7, 2022, in its allegations. For the reasons set forth in its accompanying memorandum, GBP respectfully requests that its motion for leave to amend be granted.

Dated: July 21, 2022

Respectfully submitted,

GENBIOPRO, INC.

By Its Attorneys,

BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, PC

By: s/ J. Carter Thompson, Jr.
J. CARTER THOMPSON, JR.

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CERTIFICATE OF SERVICE

I certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which served a copy upon all counsel of record who have registered with that system.

This the 21st day of July, 2022.

/s/ J. Carter Thompson, Jr.

J. CARTER THOMPSON, JR.